## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON EUGENE DIVISION NICHOLAS JAMES MCGUFFIN, as an individual and as guardian ad ) litem, on behalf of S.M., a ) Civil No. minor, ) 6:20-cv-01163-MK ) VIDEOCONFERENCE Plaintiffs, ) DEPOSITION v. MARK DANNELS, PAT DOWNING, SUSAN HORMANN, MARY KRINGS, KRIS KARCHER, SHELLY MCINNES, RAYMOND MCNEELY, KIP OSWALD, MICHAEL REAVES, JOHN RIDDLE, SEAN SANBORN, ERIC SCHWENNINGER, RICHARD WALTER, CHRIS WEBLEY, ANTHONY WETMORE, KATHY WILCOX, CRAIG ZANNI, DAVID ZAVALA, ESTATE OF DAVE HALL, VIDOCO SOCIETY, CITY OF COQUILLE, CITY OF COOS BAY, COOS COUNTY, and OREGON STATE POLICE, Defendants.

DEPOSITION UPON ORAL EXAMINATION
OF DAVID ZAVALA

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Comparison   Com	3	adverse-party witness, was taken remotely via videoconference	3		
S. Oberlife Court Reporter for Oregon, on Wooday, the SEth day of Pereira, 2011, et the hour of 9100 a.m., in the Reste of Subcontractor for Oregon.	4	on behalf of the Plaintiffs, before JEAN M. KOSTNER, a		REPORTED BY:	
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Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly D. McInnes)  16  Jesse B. Davis 17 OREGON DEPARTMENT OF JUSTICE 18 Portland, Oregon 97201 (503) 947-4700 19 jesse.b.davis@doj.state.or.us (Representing Oregon State Police, John Riddle, 20 Susan Hormann, Mary Krings, Kathy Wilcox) 21 Amanda Rockett WOOD SMITH HENNING & BERMAN LLP 22 12755 Southwest 69th Avenue, Suite 100 Portland, Oregon 97223 23 (971) 256-4023 arockett@wshblaw.com (Representing Vidocq Society and Richard Walter) 25 Information Requested by Mr. Lauersdorf: PAGE LINE Information Requested by Mr. Lauersdorf: PAGE LINE 16 27 Reports reviewed prior to depositions 17 19 20 20 21 Portland, Oregon 97201 21 Amanda Rockett WOOD SMITH HENNING & BERMAN LLP 22 12755 Southwest 69th Avenue, Suite 100 Portland, Oregon 97223 23 (971) 256-4023 arockett@wshblaw.com (Representing Vidocq Society and Richard Walter)	2 3 4 5 6 7 8 9 10 11	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com oN BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay,	2 3 WI 4 5 6 7 8 9 10 11 12 13	TNESS  DAVID ZAVALA  Examination by Mr. Lauersdorf	PAGE
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16  Jesse B. Davis 17 OREGON DEPARTMENT OF JUSTICE 18 Portland, Oregon 97201 (503) 947-4700 19 jesse.b.davis@doj.state.or.us (Representing Oregon State Police, John Riddle, 20 Susan Hormann, Mary Krings, Kathy Wilcox) 21 Amanda Rockett WOOD SMITH HENNING & BERMAN LLP 22 12755 Southwest 69th Avenue, Suite 100 Portland, Oregon 97223 23 (971) 256-4023 arockett@wshblaw.com (Representing Vidocq Society and Richard Walter) 25 Reports reviewed prior to depositions 17 19 20 20 21 22 23 24 24 24 25 26 27 28 29 29 29 20 20 20 21 22 22 23 23 24 24 25 26 27 28 29 29 20 20 20 21 22 22 23 23 24 24 25 26 27 28 29 29 20 20 20 20 21 22 22 23 23 24 24 25 26 27 28 29 29 20 20 20 20 20 21 22 22 23 23 23 24 25 26 27 28 29 29 20 20 20 20 20 21 22 22 23 23 23 24 25 26 27 28 29 20 20 20 20 20 20 21 22 22 23 23 23 24 25 26 27 28 28 29 29 20 20 20 20 20 20 21 20 20 21 22 22 23 23 23 23 24 24 25 25	2 3 4 5 6 7 8 9 10 11 12 13	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald,	2 3 W1 4 5 6 7 8 9 10 11 12 13	TNESS  DAVID ZAVALA  Examination by Mr. Lauersdorf	PAGE
17	2 3 4 5 6 7 8 9 10 11 12 13	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore,	2 3 W1 4 5 6 7 8 9 10 11 12 13 14 15	THESS  DAVID ZAVALA  Examination by Mr. Lauersdorf  REQUESTS FOR INFORMATION	PAGE 7
18	2 3 4 5 6 7 8 9 10 11 12 13 14 15	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly D. McInnes)	2 3 W1 4 5 6 7 8 9 10 11 12 13 14 15	THESS  DAVID ZAVALA  Examination by Mr. Lauersdorf  REQUESTS FOR INFORMATION	PAGE
(503) 947-4700 19 19	2 3 4 5 6 7 8 9 10 11 12 13 14 15	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly D. McInnes)  Jesse B. Davis OREGON DEPARTMENT OF JUSTICE	2 3 W1 4 5 6 7 8 9 10 11 12 13 14 15 Ir	DAVID ZAVALA  Examination by Mr. Lauersdorf  REQUESTS FOR INFORMATION  aformation Requested by Mr. Lauersdorf:	PAGE 7
(Representing Oregon State Police, John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox) Amanda Rockett WOOD SMITH HENNING & BERMAN LLP 22 12755 Southwest 69th Avenue, Suite 100 Portland, Oregon 97223 (971) 256-4023 arockettewshblaw.com (Representing Vidocq Society and Richard Walter)  26 27 28 29 29 20 20 21 22 23 23 24 25 26 26 27 28 29 29 20 20 20 21 22 23 23 24 25 26 26 27 28 29 20 20 20 21 22 23 23 24 25 26 26 27 28 29 20 20 20 21 20 21 22 23 23 24 24 25 25	2 3 4 5 6 7 8 8 9 10 11 12 13 14 15 16 17	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly D. McInnes)  Jesse B. Davis OREGON DEPARTMENT OF JUSTICE 100 Southwest Market Street	2 3 W1 4 5 6 7 8 9 10 11 12 13 14 15 III 16	DAVID ZAVALA  Examination by Mr. Lauersdorf  REQUESTS FOR INFORMATION  aformation Requested by Mr. Lauersdorf:	PAGE 7
21 Amanda Rockett  WOOD SMITH HENNING & BERMAN LLP 22 12755 Southwest 69th Avenue, Suite 100 Portland, Oregon 97223 23 (971) 256-4023 24 (Representing Vidocq Society and Richard Walter) 25	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly D. McInnes)  Jesse B. Davis OREGON DEPARTMENT OF JUSTICE 100 Southwest Market Street Portland, Oregon 97201 (503) 947-4700	2 3 W1 4 5 6 7 8 9 10 11 12 13 14 15 Ir 16 17 18	DAVID ZAVALA  Examination by Mr. Lauersdorf  REQUESTS FOR INFORMATION  aformation Requested by Mr. Lauersdorf:	PAGE 7
WOOD SMITH HENNING & BERMAN LLP   22	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly D. McInnes)  Jesse B. Davis OREGON DEPARTMENT OF JUSTICE 100 Southwest Market Street Portland, Oregon 97201 (503) 947-4700 jesse.b. davis@dj.state.or.us	2 3 W) 4 5 6 7 8 9 10 11 12 13 14 15 Ir 16 17 18	DAVID ZAVALA  Examination by Mr. Lauersdorf  REQUESTS FOR INFORMATION  aformation Requested by Mr. Lauersdorf:	PAGE 7
Portland, Oregon 97223  23 (971) 256-4023  arockett@wshblaw.com  24 (Representing Vidocq Society and Richard Walter)  25	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 aclemlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly D. McInnes)  Jesse B. Davis OREGON DEPARTMENT OF JUSTICE 100 Southwest Market Street Portland, Oregon 97201 (503) 947-4700 jesse.b.davis@doj.state.or.us (Representing Oregon State Police, John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox)	2 3 W1 4 5 6 7 8 9 10 11 12 13 14 15 IT 16 17 18 19 20	DAVID ZAVALA  Examination by Mr. Lauersdorf  REQUESTS FOR INFORMATION  aformation Requested by Mr. Lauersdorf:	PAGE 7
23 (971) 256-4023 24 24 24 (Representing Vidocq Society and Richard Walter) 25	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly D. McInnes)  Jesse B. Davis OREGON DEPARIMENT OF JUSTICE 100 Southwest Market Street Portland, Oregon 97201 (503) 947-4700 jesse.b. davis@doj.state.or.us (Representing Oregon State Police, John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox) Amanda Rockett WOOD SMITH HENNING & BERMAN LLP	2 3 W1 4 5 6 7 8 9 10 11 12 13 14 15 Ir 16 17 18 19 20 21	DAVID ZAVALA  Examination by Mr. Lauersdorf  REQUESTS FOR INFORMATION  aformation Requested by Mr. Lauersdorf:	PAGE 7
24 (Representing Vidocq Society and Richard Walter) 25	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly D. McInnes)  Jesse B. Davis OREGON DEPARTMENT OF JUSTICE 100 Southwest Market Street Portland, Oregon 97201 (503) 947-4700 jesse.b.davis@doj.state.or.us (Representing Oregon State Police, John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox) Amanda Rockett WOOD SMITH HENNING & BERMAN LLP 12755 Southwest 69th Avenue, Suite 100	2 3 W1 4 5 6 7 8 9 10 11 12 13 14 15 Ir 16 17 18 19 20 21	DAVID ZAVALA  Examination by Mr. Lauersdorf  REQUESTS FOR INFORMATION  aformation Requested by Mr. Lauersdorf:	PAGE 7
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly D. McInnes)  Jesse B. Davis OREGON DEPARIMENT OF JUSTICE 100 Southwest Market Street Portland, Oregon 97201 (503) 947-4700 jesse.b. davis@doj.state.or.us (Representing Oregon State Police, John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox) Ammada Rockett WOOD SMITH HENNING & BERMAN LLP 12755 Southwest 69th Avenue, Suite 100 Portland, Oregon 97223 (971) 256-4023	2 3 W1 4 5 6 7 8 9 10 11 12 13 14 15 Ir 16 17 18 19 20 21 22 23	DAVID ZAVALA  Examination by Mr. Lauersdorf  REQUESTS FOR INFORMATION  aformation Requested by Mr. Lauersdorf:	PAGE 7
25	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	APPEARANCES  ON BEHALF OF THE PLAINTIFFS:  Andrew C. Lauersdorf, OSB #980739 Janis C. Puracal, OSB #132288 Christine A. Webb, OSB #184744 MALONEY LAUERSDORF, REINER, PC 1111 East Burnside Street, Suite 300 Portland, Oregon 97214 (503 245-1518 acl@mlrlegalteam.com jcp@mlrlegalteam.com caw@mlrlegalteam.com ON BEHALF OF THE DEFENDANTS: Sarah R. Henderson LAW OFFICE OF ROBERT E. FRANZ, JR. Post Office Box 62 Springfield, Oregon 97477 (541) 741-8220 shenderson@franzlaw.comcastbiz.net (Representing City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly D. McInnes)  Jesse B. Davis OREGON DEPARTMENT OF JUSTICE 100 Southwest Market Street Portland, Oregon 97201 (503) 947-4700 jesse.b. davis@doj.state.or.us (Representing Oregon State Police, John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox) Amanda Rockett WOOD SMITH HENNING & BERMAN LLP 12755 Southwest 69th Avenue, Suite 100 Portland, Oregon 97223 (971) 256-4023 arockett@wshblaw.com	2 3 W1 4 5 6 7 8 9 10 11 12 13 14 15 IT 16 17 18 19 20 21 22 23 24	DAVID ZAVALA  Examination by Mr. Lauersdorf  REQUESTS FOR INFORMATION  aformation Requested by Mr. Lauersdorf:	PAGE 7

			.ember		
1		INDEX OF EXHIBITS	Page 6	1	Page 8
2				2	
	DEPOSITION			3	
3	EXHIBIT NO.	DESCRIPTION	IDENTIFIED	4	
5	EXH 1	Coquille Police Department Incident		5	~ 1
		Report, No. 00001911, 06/29/00 (4 pages	3) 45	6	
6				_	*
	EXH 2	Coquille Police Department Supplemental		7	
7	PW 2	Report, No. 00001905, 06/29/00 (5 pages	3) 46	8	
8	EXH 3	Coquille Police Department Supplemental Report, No. 00001905, 06/29/00 (3 pages)	50	9	
9		Reporte, No. 00001303, 00, 23, 00 (3 pages)	30	10	~ 1 1
	EXH 11	Emails, 06/11/10	75	11	* *
10				12	~
	EXH 13	David Zavala Grand Jury Testimony	79	13	A. Salem, Oregon. February 4th, 1971.
11	EXH 15	(11 pages) Police Notebook (151 pages)	97	14	Q. And what's your current address? Business address.
13	EXH 16	Map of Coquille Loop	88	15	A. My business address, 930 Chemawa Road, Northeast,
14	EXH 17	Map of Fishtrap Road, Turnaround	88	16	Keizer, Oregon.
15				17	COURT REPORTER: 930 what's the road?
16				18	A. Chemawa, C-H-E-M-A-W-A, Road, Northeast, and that's
17 18				19	in Keizer, Oregon.
19				20	BY MR. LAUERSDORF:
20				21	Q. And that's Keizer, K-E-I-Z-E-R. Right?
21				22	A. Yes.
22				23	Q. Who is your current employer?
23				24	
24				25	1
		DAUTE GAUALA	Page 7	1	Page 9
1	11 1	DAVID ZAVALA,	,	1	
2		witness on behalf of the Plaintiffs, havi	-	2	~ 1
3		sworn to tell the truth, the whole truth,		3	
4	nothing but	the truth, was examined and testified as	tollows:	4	~ 1
5		THE WITNESS: Yes, I do.		5	
6		EXAMINATION		6	Q. Are you still a school resource officer?
7	BY MR. LAUE			7	A. I am not.
8	Q.	Officer Zavala, my name is Andy Lauersdor	f. You	8	Q. Have you attained a rank beyond a standard officer?
9	and I have 1	never met before. Is that right?		9	9 Sergeant, lieutenant, captain, anything like that? Detective?
10	A.	Yes.		10	A. Well, I guess I'd question detective as being a
11	Q.	Are you having trouble hearing me?		11	rank.
112	A.	I was just going to turn it up just a lit	tle bit.	12	Q. Well, any title beyond police officer.
12		Okay.		1.0	
13	Q.	-		13	A. I would say no. I say that because the position
		All right.		13	
13		•			I'm currently in from our agency, we are not documented as or
13 14	A.	All right.		14	I'm currently in from our agency, we are not documented as or considered detectives due to our agree shoot, I just drew a
13 14 15	А.	All right. MS. HENDERSON: Oh, that's	little	14 15	I'm currently in from our agency, we are not documented as or considered detectives due to our agree shoot, I just drew a blank based on our contract, but other agencies consider us
13 14 15 16	А.	All right. MS. HENDERSON: Oh, that's That's about it. Okay.	little	14 15 16	I'm currently in from our agency, we are not documented as or considered detectives due to our agree shoot, I just drew a blank based on our contract, but other agencies consider us detectives because of the work that we do.
13 14 15 16 17	A. A. bigger so we	All right.  MS. HENDERSON: Oh, that's That's about it. Okay.  MS. HENDERSON: I'm going to make this a e can see better.	little	14 15 16 17	I'm currently in from our agency, we are not documented as or considered detectives due to our agree shoot, I just drew a blank based on our contract, but other agencies consider us detectives because of the work that we do.  Q. Okay. But you haven't achieved the rank of
13 14 15 16 17 18 19	A.  A.  bigger so we BY MR. LAUE	All right.  MS. HENDERSON: Oh, that's  That's about it. Okay.  MS. HENDERSON: I'm going to make this a e can see better.  RSDORF:		14 15 16 17 18 19	I'm currently in from our agency, we are not documented as or considered detectives due to our agree shoot, I just drew a blank based on our contract, but other agencies consider us detectives because of the work that we do.  Q. Okay. But you haven't achieved the rank of sergeant or lieutenant or captain, anything like that?
13 14 15 16 17 18 19 20	A.  bigger so we BY MR. LAUES	All right.  MS. HENDERSON: Oh, that's That's about it. Okay.  MS. HENDERSON: I'm going to make this a e can see better.  RSDORF: You understand that I'm an attorney. Cor		14 15 16 17 18 19 20	I'm currently in from our agency, we are not documented as or considered detectives due to our agree shoot, I just drew a blank based on our contract, but other agencies consider us detectives because of the work that we do.  Q. Okay. But you haven't achieved the rank of sergeant or lieutenant or captain, anything like that?  A. That is correct. I have not.
13 14 15 16 17 18 19 20 21	A.  A.  bigger so we BY MR. LAUEI Q. A.	All right.  MS. HENDERSON: Oh, that's That's about it. Okay.  MS. HENDERSON: I'm going to make this a e can see better.  RSDORF: You understand that I'm an attorney. Cor Yes.	rect?	14 15 16 17 18 19 20 21	I'm currently in from our agency, we are not documented as or considered detectives due to our agree shoot, I just drew a blank based on our contract, but other agencies consider us detectives because of the work that we do.  Q. Okay. But you haven't achieved the rank of sergeant or lieutenant or captain, anything like that?  A. That is correct. I have not.  Q. Okay. And what's your DPSST number?
13 14 15 16 17 18 19 20 21 22	A.  bigger so we BY MR. LAUEU Q. A. Q.	All right.  MS. HENDERSON: Oh, that's That's about it. Okay.  MS. HENDERSON: I'm going to make this a e can see better.  RSDORF: You understand that I'm an attorney. Cor Yes.  And you understand that I represent the p	rect? laintiffs	14 15 16 17 18 19 20 21 22	I'm currently in from our agency, we are not documented as or considered detectives due to our agree shoot, I just drew a blank based on our contract, but other agencies consider us detectives because of the work that we do.  Q. Okay. But you haven't achieved the rank of sergeant or lieutenant or captain, anything like that?  A. That is correct. I have not.  Q. Okay. And what's your DPSST number?  A. 37549.
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# David Zavala

	December	2(	0, 2021
1 2 3 4	Q. And so Coquille PD didn't have any kind of policy about you having to write up your reports as soon as possible or the next day or whatever after an encounter?  A. Not that I can recall, that there was a policy for		Q. Do you know what a Brady obligation is?  A. I'm familiar with the term of being "bradied." I had not heard that term until recently here where I work at the Keizer Police Department.
5	that, to give us a timeline.	5	Q. Okay. What does "being bradied" mean to you?
6	Q. Okay. So from their perspective, it was when you	6	A. To me it means that we, as an officer, are not
7	got to it, you got to it?	7	found to be credible and that we will not be able to give
8	A. That was something you would have to ask them.	8	testimony in a criminal nature.
9	Q. Okay. And then, if an investigation that you were	9	Q. Okay. Did anyone at Coquille ever provide you any
10	involved in resulted in a suspect being charged or indicted,	10	training with your obligations to turn over evidence to a
11	what were you supposed to do with your reports and notebooks at	11	criminal defendant?
12	that point?	12	A. That, I don't recall.
13	A. If they were charged and indicted?	13	Q. While you were employed with Coquille Police
14	Q. Charged or indicted.	14	Department, did Coquille Police Department provide you any
15	A. So I guess I'm not understanding the question.	15	training on protecting a suspect's constitutional rights?
16	Because you	16	A. That, I don't recall.
17	Q. But you understand that a person can be charged on	17	Q. Were you assigned a mentor when you started at the
18	an information. Right? A person can be charged with a crime	18	Coquille PD? Or just the FTO?
19	and tried without being indicted. Right?	19	A. Just the FTO.
20	A. Correct. I understand that.	20	Q. And how long did you have to work with the FTO?
21	Q. So when a suspect is either charged with a crime	21	How long was your field training?
22	and being prosecuted, or indicted and being prosecuted, at that	22	A. From the time that I started employment there until
23	point what was your what were you supposed to do with your	23	the time that I completed my FTEP manual, which I think you
24	notebooks and police reports?	24	alluded to was in May of May of '99.
25	A. Well, with the police report, once we complete it,	25	Q. Okay. So at that point you would have been on your
	Page 35	_	Page 37
	it gets sent to the supervisor to approve it.		own? A. Correct.
2 3	Q. Okay.  A. At that point, I would assume that they are the	3	Q. And what was the chain of command at Coquille PD
4	ones that route it. Our records department would route it to		when you started? Who was your direct report?
5	the DA's office, so the DA's office would have that report.	5	A. Depending on which shift I was working, because
6	Q. Okay. So you don't have any role in making sure	6	there's times that I would work by myself; there's other times
	that the DA would get your reports?	7	that I would work during the daytime, and you would have a
8	A. No.	8	lieutenant there, you may have a sergeant there, and you also
9	Q. Did you have any role in making sure that the DA		had the police chief there.
10	would get your notebooks?	10	Q. Who was responsible for reviewing your reports?
11	A. No.	11	A. I don't know if anybody one if one person was
12		10	
	Q. In the time you were employed with the Coquille	12	responsible. I know I didn't review them, so I don't know
13	Q. In the time you were employed with the Coquille Police Department, did they provide you with any in-house	13	who you would have to ask them who was ultimately
13 14			
	Police Department, did they provide you with any in-house	13	who you would have to ask them who was ultimately
14	Police Department, did they provide you with any in-house training on evaluating witness credibility?	13 14	who you would have to ask them who was ultimately responsible.
14 15	Police Department, did they provide you with any in-house training on evaluating witness credibility?  A. That, I do not recall.	13 14 15	who you would have to ask them who was ultimately responsible.  Q. Okay. Well, who do you recall reviewing any of
14 15 16	Police Department, did they provide you with any in-house training on evaluating witness credibility?  A. That, I do not recall.  Q. Did they provide you with any in-house training on	13 14 15 16	who you would have to ask them who was ultimately responsible.  Q. Okay. Well, who do you recall reviewing any of your reports?
14 15 16 17	Police Department, did they provide you with any in-house training on evaluating witness credibility?  A. That, I do not recall.  Q. Did they provide you with any in-house training on documenting a crime scene?	13 14 15 16 17	who you would have to ask them who was ultimately responsible.  Q. Okay. Well, who do you recall reviewing any of your reports?  A. Chief Reaves. Q. Okay. Anyone else? A. No.
14 15 16 17 18	Police Department, did they provide you with any in-house training on evaluating witness credibility?  A. That, I do not recall.  Q. Did they provide you with any in-house training on documenting a crime scene?  A. That, I do not recall.	13 14 15 16 17 18	who you would have to ask them who was ultimately responsible.  Q. Okay. Well, who do you recall reviewing any of your reports?  A. Chief Reaves. Q. Okay. Anyone else?

Q. During your time with Coquille Police Department,

23 did they provide you with any in-house training on what are

24 commonly referred to as "Brady obligations"?

A. That, I do not recall.

Q. So what kind of cases did you handle then at the

22 patrol officer? 23 A. Yes.

25 outset?

1	Page 118 BY MR. LAUERSDORF:	Page 120   1 STATE OF OREGON )
2	Q. Okay. Are you familiar with the ABC News program	) ss. CERTIFICATE
3	20/20?	2 County of Douglas )
4	A. Yes.	3  4 I. JEAN M. KOSTNER. Certified Shorthand Reporter for the
5	Q. Have you ever seen the episode that aired on	4 I, JEAN M. KOSTNER, Certified Shorthand Reporter for the 5 state of Oregon, do hereby certify that:
6	October 15th, 2010, about the disappearance of Ms. Freeman?	6 Pursuant to stipulation of counsel for the respective
7	A. No.	7 parties, hereinbefore set forth, DAVID ZAVALA, appeared
8	Q. Never?	8 remotely before me via Zoom videoconference at the time and
9	A. No.	9 place set forth in the caption hereof;
10	MR. LAUERSDORF: All right. Let's take a what	10 That, at said time and place, I reported in stenotype
11	have we got? 12:04? Let's take six minutes. I just want to	11 all testimony adduced and oral proceedings had in the foregoing
12	go over $m\!y$ notes, and then I think we can probably wrap it up.	12 matter, to the best of my ability; 13 That, thereafter, my notes were reduced to typewriting,
13	Okay?	14 and that the foregoing transcript, pages 1 through 119, both
14	MS. HENDERSON: Okay.	15 inclusive, constitutes a full, true, and correct transcript of
15	(Recess taken from 12:04 p.m. to 12:10 p.m.)	16 all such testimony adduced and oral proceedings had and of the
16	MR. LAUERSDORF: Okay. Back on the record with	17 whole thereof.
17	actually Officer David Zavala rather than Sarah Henderson	18 IN WITNESS WHEREOF, I have hereunto set my hand and CSR
18	there.	19 stamp this 5th day of January, 2022, in the City of Roseburg,
19	That's all of the questions that I have, so I'll go	20 County of Douglas, State of Oregon.
20	• •	21 22 Jeann. Kozher
21	• •	A
	right to read and sign, so I'll just note that for the record.	23 JEAN M. KOSTNER
	And we will take a copy of the transcript.	Certified Court Reporter
24	MS. HENDERSON: So you guys are ordering the	24 CSR No. 90-0051
25	original?	25
	Page 119	Page 121
1	MR. LAUERSDORF: We'll order the original. Sure.	1 DEPOSITION ERRATA SHEET
2	MS. HENDERSON: Okay. And I will take a copy. And	Page No Line No
3	thank you, yes, reserve the right to read and sign.	Change:4
4	MR. LAUERSDORF: Anybody else have any questions	Reason for change:
5	for Officer Zavala?	r .
6		Page No Line No
	MR. DAVIS: This is Jesse Davis. I don't have	Page No Line No 6 Change:
	questions, but I would like a copy of the transcript.	Page No Line No 6
8	questions, but I would like a copy of the transcript.  MR. LAUERSDORF: Okay. Ms. Rockett, a copy of the	Page No Line No 6
8	questions, but I would like a copy of the transcript.  MR. LAUERSDORF: Okay. Ms. Rockett, a copy of the transcript?	Page No Line No  Change:  Reason for change:  Page No Line No  Page No Line No
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